

O'NEILL / HASSEN

Attorneys at Law

October 8, 2020

VIA ECF and Email

Honorable Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

RE: *United States v. Omar Amanat*, 15 cr. 536 (PGG)

Dear Judge Gardephe:

I am the attorney representing Mr. Amanat in the above-captioned matter, pursuant to the CJA. I am writing to request that the Court appoint Jacob Mitchell as replacement associate counsel in this case at the rate of \$100 per hour. Prior associate counsel, Abraham Hassen, is attending graduate school and is no longer available to assist with this case.

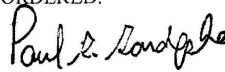
As the Court is aware, this is an extremely complex case and there are still a number of motions that must be litigated, including a final sentencing. Additionally, there is a lot of evidentiary information that must be analyzed and reviewed, including complex digital forensics. Mr. Mitchell is an expert in eDiscovery and has significant experience with digital forensics, which is much needed in this case.

There are several outstanding motions and a pending complex *Fatico* hearing. I will need an associate to assist me with preparing and conducting the hearing. Mr. Mitchell has recently served as associate counsel in several trials and on numerous cases in the southern district, and the colleagues with whom he has worked have raved about his diligence and professionalism. I ask that the Court apportion an additional 250 hours for Mr. Mitchell to work on this case. Mr. Mitchell's resume is attached for the Court's review.

Memo Endorsed:

Jacob Mitchell is approved as a replacement associate. The rate of \$100 per hour is also approved. Finally, this Court will approve 100 additional hours for Mitchell.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dated: October 9, 2020

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I thank the Court for its attention to this matter.

Kind regards,

/s/

Grainne E. O'Neill

Jacob B. Mitchell

221 Cumberland Street, Apt. 1, Brooklyn, NY 11205

(540) 273-3400

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EDUCATION

New York Law School, J.D., May 2010

- **Admission** - New York State, SDNY, EDNY

Fordham University, May 2005

- Graduate School of education

Bard College, B.A., Political Science, May 2004

- **Awarded** - Certificate of Intensive Study at Bard Globalization and International Affairs Program

EXPERIENCE

The Law Office of Jacob Barclay Mitchell

December 2014 – Present

Federal Criminal Defense Attorney

- Member of trial team for defendant Ryan Quashie in *U.S v. Ryan Quashie* 14 Cr 376 (BMC). Client was acquitted on top two counts of Hobbs Act Robbery and Attempted Hobbs Act Robbery.
- Member of trial team for defendant Demetrius Washington in *People v. Demetrious Washington* 2607-2016, seven weeks of trial, 22 count indictment with 84 overt acts, including homicide, gang assault, weapons possession and conspiracy to commit murder. Acquitted of homicide, convicted of lesser counts.
- Assist solo practitioners representing clients in criminal cases, including, Stephanie Carvlin, Susan Walsh, Allan Haber, Kenneth Paul, Scott Tulman, Donna Newman, Avrom Robin and Richard Lind.
- Conducted multiple cross examinations and a direct examination at trial.
- Drafted sentencing submissions and argued at sentencing on behalf of clients.
- Handled arraignments, duty days and all aspects of federal criminal cases.
- Reviewed electronic discovery in mega cases with multiple terabytes of discovery.
 - Including:
 - Forensic images of servers.
 - Forensic images of cellphones.
 - Forensic images of devices.
 - Review discovery in the format of Linux, MAC and Windows.
 - Review servers used in dark web, bitcoin cryptocurrency cases.
- Make court appearances from violations of supervised release to pretrial conferences.
- Manage, organize and index electronic discovery in federal criminal cases.
- Perform legal research, writing and trial preparation.

De Novo Legal

August 2011 - December 2014

Electronic Discovery Attorney

- Conducted electronic discovery from first level review to production.
- Participated in weekly client briefings.
- Responsible for making determinations regarding document relevancy, responsiveness, confidentiality, attorney-client privilege and attorney work product.
- Redacted confidential information; created privilege log to justify legal basis of privilege to judge as well as identify potential unforeseen issues that might arise in depositions.

Brooklyn Bar Association Volunteer Lawyer Program

July 2011 - December 2014

Foreclosure Defense Attorney

- Represented homeowners in foreclosure proceedings.
- Provided counsel and guidance to clients facing the loss of their home.
- Prepared applications for mortgage modifications.
- Conducted negotiations and mediations to attain mortgage modifications for clients.
- Adept in foreclosure prevention and settlement conference procedure.

New York State Courts Access to Justice Program

February 2011 - April 2011

Public Service Graduate Fellow for Consumer Credit Project

- Appeared before judges, interviewed and prepared clients.
- Filed for discovery orders and hearings to contest adequacy of service.
- Negotiated with opposing counsel and finalized settlement agreements favorable to clients.

New York State Supreme Court

May 2009 - November 2009

Law Clerk for the Honorable Emily Jane Goodman

- Drafted memoranda and opinions on myriad legal questions for the Judge.
- Conducted pre-trial conferences, led settlement conferences and assisted the Judge at trial.
- Ensured attorneys complied with court rules concerning settlements.
- Performed legal research for cases on Judge Goodman's docket.

Kennedy, Jennik & Murray P.C.

May 2008 - August 2008

Law Clerk

- Drafted complaints, answers, arbitration briefs and amendments to pension trusts.
- Researched and prepared memoranda on state and federal labor law cases.
- Supported partners at client interviews, client meetings, negotiations and arbitrations.
- In charge of summarizing and highlighting legal changes relating to the Delphi bankruptcy.
- Assisted in negotiations with Delphi to implement reorganization plans.

Office of Manhattan Borough President Scott Stringer

October 2006 - March 2007

Communications Department

- Tracked press coverage, compiled press packets and planned for Community Board meetings.
- Digitalized and expanded database of media sources used by the communications department.

New York City Public School 334 and Middle School 245

September 2004 - June 2006

Teacher

- Taught 6th and 7th grade Biology, Chemistry and Physics.
- Taught 8th grade Earth Science.